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REMARKS

Claims 1-9 were originally presented in the subject application. Claim 10-48 were added in a Preliminary Amendment dated April 12, 2002. Claims 19, 20, 32, 33, 45 and 46 have hereinabove been amended to more particularly point out and distinctly claim the subject invention. No claims have herein been added or canceled. Therefore, claims 1-48 remain in this case.

The addition of new matter has been scrupulously avoided. In that regard, support for the amendments can be found throughout the specification, for example, page 12 of the specification.

Applicants respectfully request entry of these remarks, and reconsideration and withdrawal of the various grounds of rejection.

35 U.S.C. §112 Rejection

The Office Action rejected claims 19, 20, 32, 33, 45 and 46 under 35 U.S.C. §112, as allegedly indefinite for failing to particularly point out and distinctly claim the subject matter of the invention. In particular, the Office Action identified "read locking" in the rejected claims as a possible typographical error, and assumed that "write locking" was intended.

Based on page 12 of the specification, describing the various read/write lock scenarios, Applicant has amended each of the noted claims. There were typographical errors present, but not those assumed in the Office Action. In particular, with regard to claims 19, 32 and 45, the first resource is read locked and the second resource is write locked in order to write to the second resource. With regard to claims 20, 33 and 46, one of the first resource and the second resource are indeed read locked while the third resource is write locked, but what was missing was that it is done in order to write to the third resource.

As amended, Applicants submit that claims 19, 20, 32, 33, 45 and 46 are in proper form.

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35 U.S.C. §102 Rejection

The Office Action rejected independent claims 1, 4 and 7 under 35 U.S.C. §102(c), as allegedly anticipated by Leff et al. (U.S. Patent No. 6,275,863). Applicants respectfully, but most strenuously, traverse this rejection.

Applicants submit that Leff et al. fails to disclose, teach or suggest, for example, determining a relationship between a plurality of resources of a data repository, the relationship being at least one of a containment-based relationship and a reference-based relationship. Applicants do not claim merely the type of relationship, but determining a relationship between resources, which relationship is at least one of containment-based and reference-based. Applicants submit Leff et al. does not disclose, teach or suggest this aspect of the rejected claims, since it is simply not necessary to do so.

In Leff et al., various lock modes are selectively used to allow multiple users to access the same database information. In one example provided in column 13 of Leff et al., starting at line 12, a car insurance policy object is described. Open lock modes are used to allow, for example, a car to be added to the policy while at the same time billing the policy, while preventing, for example, billing to proceed while the address for the policy is being updated. In short, compatible operations are allowed and incompatible operations prevented from occurring simultaneously, using the selective locks.

While Leff et al. may be determining whether operations will result in compatible or incompatible operations, this has nothing whatever to do with determining a relationship between resources, which relationship is at least one of containment-based and reference-based. Compatibility or incompatibility is determined based on the resulting operations, and not based on a determined relationship between resources.

Moreover, since Leff et al. does not disclose, teach or suggest determining the claimed relationship, Applicants submit it cannot teach doing anything based on that relationship, in this case, locking based on the relationship.

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Therefore, Applicants submit that none of claims 1, 4 and 7 can be anticipated by, or made obvious over, Leff et al.

The Office Action also rejected claims 1-10, 22, 23, 35, 36 and 48 as allegedly anticipated by Soltis et al. (U.S. Patent No. 6,493,804). Applicants respectfully, but most strenuously, traverse this rejection as well.

Against the determining step of claim 1, the Office Action cites to column 5, line 63 to column 6, line 8 of Soltis et al. However, the cited section of Soltis et al. merely discloses the use of RAID storage for simultaneous access to data by different clients. Applicants fail to see any relevance of the cited section to the determining step of claim 1. Like Leff et al., Applicants submit Soltis et al. has no need to determine a relationship between resources, much less determine a relationship that is at least one of containment-based and reference-based.

In general, Applicants submit that Soltis et al. is concerned with providing shared or exclusive access to data, based on whether the data is to be modified. Again, like Leff et al., Applicants submit this has nothing whatever to do with determining the claimed relationship, or locking based on that relationship. Locking in Soltis et al. (whether exclusive or shared) is based on whether data is to be modified and is simply unrelated to locking based on a determined relationship between resources, which relationship is at least one of containment-based and reference-based.

Therefore, Applicants submit that claim 1 cannot be anticipated by, or made obvious over, Soltis et al. Claims 4 and 7 contain limitations similar to those argued above with respect to claim 1. Thus, the remarks above are equally applicable to claims 4 and 7.

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CONCLUSION

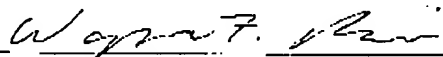
Applicants submit that the dependent claims are allowable for the same reasons as the independent claims from which they directly or ultimately depend, as well as for their additional limitations.

Applicants acknowledge the references cited in the Office Action, but not substantively applied. However, Applicants submit that the pending claims are patentable thereover as well.

For all the above reasons, Applicants maintain that the claims of the subject application define patentable subject matter and earnestly request entry of these amendments and remarks, and allowance of claims 1-48.

If a telephone conference would be of assistance in advancing prosecution of the subject application, Applicants' undersigned attorney invites the Examiner to telephone him at the number provided.

Respectfully submitted,


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